

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

TARGET CORP., *et al.*,

Plaintiffs,

v.

VISA INC., *et al.*,

Defendants.

Case No. 13-cv-3477 (AKH)

*Motion to seal
granted 6.4.25
Alvin K. Hellerstein*

7-ELEVEN, INC., *et al.*,

Plaintiffs,

v.

VISA INC., *et al.*,

Defendants.

Case No. 13-cv-4442 (AKH)

NOTICE OF MOTION FOR LEAVE TO FILE UNDER SEAL
NETWORK DEFENDANTS' REPLY IN FURTHER SUPPORT OF THEIR MOTION
FOR REVISED ORDER REGULATING PROCEEDINGS PROVIDING FOR
SEPARATE TRIALS OR IN THE ALTERNATIVE, TO PRECLUDE UNDISCLOSED
EXPERT TESTIMONY UNDER FEDERAL RULE OF CIVIL PROCEDURE 37

PLEASE TAKE NOTICE THAT, pursuant to Rule 4(B)(i) of this Court's Individual Rules, the Network Defendants respectfully move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, in Courtroom 14D of the Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for leave to file under seal an unredacted version of the Network Defendants' Reply in Further Support of Their Motion for a Revised Order Regulating Proceedings Providing for Separate Trials or in the Alternative, to Preclude Undisclosed Expert Testimony

Under Federal Rule of Civil Procedure 37 (the “Reply Brief”). Accordingly, pursuant to Rule 4(B)(i) of this Court’s Individual Rules, the Network Defendants are contemporaneously herewith (i) filing on ECF a partially redacted copy of the Reply Brief; (ii) submitting an unredacted copy of the same to the Court; and (iii) serving upon Plaintiffs in the above-captioned actions unredacted copies of the same.

The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: June 2, 2025

Respectfully submitted,

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